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15 *Attorneys for Defendant*  
16 *Lightning Labs, Inc.*

17 **UNITED STATES DISTRICT COURT**  
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 ----- X  
21 TARI LABS, LLC, : Case No.: 3:22-cv-07789-WHO  
22 Plaintiff, :  
23 -against- : **DECLARATION OF**  
24 LIGHTNING LABS, INC., : **CHRISTOPHER S. FORD IN**  
25 Defendant. : **SUPPORT OF DEFENDANT'S**  
26 : **MOTION TO EXTEND**  
27 : **DEFENDANT'S TIME TO**  
28 : **ANSWER OR OTHERWISE**  
29 : **RESPOND TO COMPLAINT**  
30 : **PURSUANT TO CIVIL L.R. 6-3**

31 ----- X  
32  
33 I, CHRISTOPHER S. FORD, declare as follows:  
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35 I am an attorney admitted to practice law in the state of California and before this Court,  
36 and counsel at the law firm Debevoise & Plimpton LLP (“Debevoise”), attorneys for Defendant  
37 Lightning Labs, Inc. (“Lightning”) in the above-captioned matter. I submit this declaration in  
38 support of Lightning’s Motion to Extend Defendant’s Time to Answer or Otherwise Respond to  
39 Complaint Pursuant to Civil L.R. 6-3. Except as otherwise stated, the facts stated in this  
40

1 declaration are within my own personal knowledge, and if called upon to do so, I could testify  
2 competently thereto.

- 3 1. Based on my review of the documents filed on the docket in this matter, I understand that  
4 on January 6, 2023, Lightning and Tari Labs filed a stipulation pursuant to Civil Local  
5 Rule 6-2 extending Lightning's time to answer or otherwise respond to the Complaint by  
6 14 days, until January 24, 2023, and requesting a 14-day extension of Tari Labs' deadline  
7 to respond to any non-answer response filed by Lightning (Dkt. 15). I also understand  
8 based on my review documents filed on the docket in this matter that this Court granted  
9 the parties' stipulation on January 9, 2023 (Dkt. 16).
- 10 2. On the evening of January 18, 2023, Lightning engaged Debevoise to represent it in the  
11 above-captioned action.
- 12 3. Along with Megan K. Bannigan, a partner at Debevoise, I undertook efforts on January  
13 19, 2023 to confer with Plaintiff's counsel appearing in this action by phone and email  
14 regarding a stipulation to extend Lightning's time to respond to the Complaint, without  
15 success. Plaintiff's counsel replied via email on the morning of January 20, declining to  
16 consent to an extension.
- 17 4. Given that Debevoise was engaged only six days before Lightning's deadline for  
18 responding to the Complaint, extending Lightning's time to respond by 14 days is  
19 necessary to provide us with sufficient time to closely review the Complaint, confer with  
20 Lightning, and prepare an appropriate response to it. Absent the requested extension,  
21 Lightning would be prejudiced because we would have insufficient time to fully  
22 investigate the underlying facts at issue in this case and prepare an appropriate response.
- 23 5. I have no reason to believe that the requested extension will have any other effect on the  
24 schedule for this case or that Tari Labs would face any prejudice as a result of such an  
25 extension.

1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct. Executed this 20th day of January, 2023, in Portland, Oregon.  
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5 By: */s/Christopher S. Ford*

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